

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

HEATHER THOMPSON (12)

No. 4:22-CR-333-O

FACTUAL RESUME

INFORMATION: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

PENALTY: \$1,000,000 fine - not more than 20 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 3 years.

MAXIMUM PENALTY:

\$1,000,000 fine and not more than twenty (20) years imprisonment, plus a term of supervised release of not less than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Information are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and

Fourth: That the overall scope of the conspiracy involved a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

In 2021 and 2022, Dale Romine, Jr., was a known methamphetamine distributor in Stephenville, Texas. James Steven Brackett received his methamphetamine from Dale Romine, Jr., that he both used and distributed to others. Sometimes, Brackett bought methamphetamine from Romine, Jr., with another person and then Brackett and the other person used the methamphetamine together and distributed whatever was left over.

On occasion, Danny Dittoe received methamphetamine from Dale Romine, Jr., in Stephenville, Texas. Danny Dittoe's drug partner was Samantha Hill; Dittoe and Hill often drove from Stephenville, Texas to Fort Worth, Texas to receive methamphetamine, and then brought it back to Stephenville for further distribution. And Dittoe was one of Dandy Ortega's several different sources of methamphetamine. Dandy Ortega received methamphetamine from Dittoe and/or Samantha Mendoza (another methamphetamine supplier in Stephenville, Texas). Ortega then either used, or distributed the methamphetamine (or both) and returned to either Dittoe or Mendoza for more methamphetamine.

Dylan Wokaly shared a common methamphetamine source with Danny Dittoe, both of whom often traveled to Fort Worth, Texas to receive methamphetamine and heroin they brought back to Stephenville for further distribution. Jessica Wokaly distributed methamphetamine to Dylan Wokaly's drug customers when he was not around, and Jessica Wokaly also rented hotel rooms in the Weatherford, Texas area from which Dylan Wokaly would distribute methamphetamine. On multiple occasions, Brad Roberts purchased multi ounce quantities of methamphetamine from Dylan Wokaly. At least one of these transactions occurred at the hotel in Weatherford, Texas, rented by Jessica Wokaly.

Heather Thompson was also a methamphetamine distributor in Stephenville, Texas. She often traveled to Fort Worth, Texas to receive multi-ounce quantities of methamphetamine from Marcel Mallory, that she brought back to Stephenville, Texas for further distribution. Thompson's primary methamphetamine customer in Stephenville, Texas, was Brad Roberts. Thompson preferred to have someone travel with her for

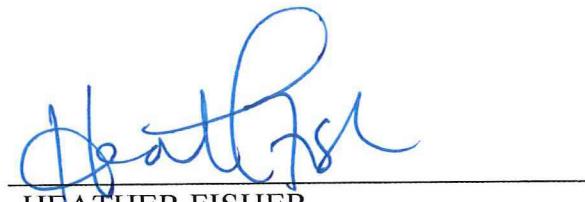
security when she was transporting methamphetamine. And Clinton McKinney accompanied Thompson on two occasions for that purpose when she received bulk amounts of methamphetamine from her source in Fort Worth, Texas. Additionally, on ~~multiple occasions~~, Thompson purchased gram quantities of heroin from Dylan Wokaly.

In this manner, James Steven Brackett, Savannah Nicole Hill, Clinton David McKinney, Dandy Meraz Ortega, Heather Thompson, Dylan Wokaly, and Jessica Nicole Wokaly conspired with each other and others to possess with the intent to distribute methamphetamine.

SIGNED this 22 day of November, 2022.



HEATHER THOMPSON
Defendant



HEATHER FISHER
Counsel for Defendant